

Three World Financial Center  
New York, NY 10281  
Telephone: 212-415-8600  
Fax: 212-303-2754  
www.lockelord.com

## Locke Lord Bissell & Liddell LLP

Attorneys & Counselors

Kevin J. Walsh  
Direct Telephone: 212-812-8304  
Direct Fax: 212-812-8364  
kwalsh@lockelord.com

August 19, 2011

VIA ECF

Hon. Dora L. Irizarry  
United States District Judge  
Eastern District of New York  
United States Courthouse  
225 Cadman Plaza East  
Room 4A South  
Brooklyn, NY 11201-1818

Re: **Ragsdale v. Lashkar-e-Taiba et al., 1:11-cu-3893**

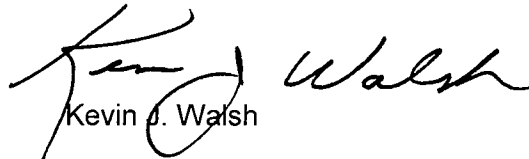
Dear Judge Irizarry:

As per your Order entered in this matter on August 17, 2011, as counsel for Defendants, Inter-Services Intelligence Directorate of the Islamic Republic of Pakistan ("ISI") and the current and former Director Generals of ISI, Ahmed Shuja Pasha and Nadeem Taj, we have today filed our Notice of Appearance in this additional action.

We have also filed a proposed Stipulated Order to confirm that this additional Plaintiff wishes to join in the opposition interposed by Plaintiffs to Defendants' pending motion in the three related cases before Your Honor – *Rosenberg, et al. v. Lashkar-e-Taiba, et al.*, 1:10-cv-05381, *Scherr, et al. v. Lashkar-e-Taiba, et al.* 1:10-cv-05382, *Chroman v. Lashkar-e-Taiba* 1:10-cv-05448 – and that Plaintiff's counsel is amenable to treating the fully-briefed motion to dismiss in the related cases as applicable to this action.

Both the Notice of Appearance and the Stipulated Order were filed by ECF. Copies are also attached, for the convenience of the Court. Should the Court have any questions, we are available at the Convenience of the Court.

Respectfully submitted,



Kevin J. Walsh

KJW:md

Enclosures

cc: James P. Kreindler, Esq.

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Atlanta, Austin, Chicago, Dallas, Hong Kong, Houston, London, Los Angeles, New Orleans, New York, Sacramento, San Francisco, Washington DC

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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LINDA RAGSDALE,

Plaintiff,

Index No.: 1:11-cv-3893

-against-

**NOTICE OF APPEARANCE**

LASHKAR-E-TAIBA (also known as Idara  
Khidmat-e-Khalq, Jamat ud Dawa, Markaz ud Dawa  
and Tehrik-e-Tahaffuz-e-Qibla Awal);  
MOHAMAED HAFIZ SAYEED, ZAKL ur  
REHMAN LAKHVI; SAJID MAJID (also known as  
Sajid Mir); AZAM CHEEMA; INTER-SERVICES  
INTELLIGENCE of the ISLAMIC REPUBLIC OF  
PAKISTAN, AHMED SHUJA PASHA, NADEEM  
TAJ, MAJOR IQBAL and MAJOR SAMIR ALI,  
Defendants.

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TO: THE CLERK OF THE COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that **LOCKE LORD BISSELL & LIDDELL LLP**, by Kevin

J. Walsh, hereby appears as attorneys for Defendants:

**Inter-Service Intelligence Directorate of the Islamic Republic of Pakistan**

**Ahmed Shuja Pasha**

**Nadeem Taj**

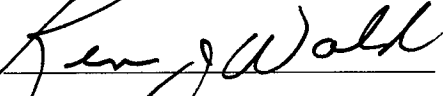
in this matter.

Defendants' right to seek dismissal on all grounds (including but not limited to lack of  
personal and subject matter jurisdiction), with the exception of improper service, is expressly  
reserved.

The below signatory certifies that he is admitted to practice in this Court.

Dated: New York, New York  
August 19, 2011

**LOCKE LORD BISSELL & LIDDELL LLP**

By: 

Kevin J. Walsh (KW 6083)  
3 World Financial Center  
New York, NY 10281-2101  
Tel No.: (212) 415-8600  
Fax No.: (212) 303-2754

*Counsel for Defendants  
Inter-Services Intelligence Of The Islamic Republic  
Of Pakistan, Ahmed Shuja Pasha and Nadeem Taj*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----  
LINDA RAGSDALE,

Plaintiff,

Index No.: 1:11-cv-3893

-against-

LASHKAR-E-TAIBA (also known as Idara  
Khidmat-e-Khalq, Jamat ud Dawa, Markaz ud Dawa  
and Tehrik-e-Tahaffuz-e-Qibla Awal);  
MOHAMAED HAFIZ SAYEED, ZAKL ur  
REHMAN LAKHVI; SAJID MAJID (also known as  
Sajid Mir); AZAM CHEEMA; INTER-SERVICES  
INTELLIGENCE of the ISLAMIC REPUBLIC OF  
PAKISTAN, AHMED SHUJA PASHA, NADEEM  
TAJ, MAJOR IQBAL and MAJOR SAMIR ALI,

Defendants.  
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**STIPULATED ORDER RE  
PROCEDURE FOR MOTION TO  
DISMISS BY CERTAIN  
DEFENDANTS**

WHEREAS, this action is related to three prior actions pending before this Court  
(*Rosenberg, et al. v. Lashkar-e-Taiba, et al.*, 1:10-cv-05381, *Scherr et al. v. Lashkar-e-Taiba, et al.*, 1:10-cv-05382 and *Chroman v. Lashkar-e-Taiba, et al.*, 1:10-cv-05448), hereinafter the  
“Pending Actions”, and has, on that basis, been assigned to this Court; and

WHEREAS, in the Pending Actions the Court on April 13, 2011 issued an Order which  
set a procedure and briefing schedule for motions to dismiss by Defendants, Inter-Services  
Intelligence Directorate of the Islamic Republic of Pakistan, Ahmed Shuja Pasha and Nadeem  
Taj; and

WHEREAS, pursuant to such Order, an initial motion to dismiss the Pending Actions by  
Defendants has been fully briefed and is pending before the Court; and

WHEREAS, Plaintiff in this action is alleged to have been injured as a result of the November 2008 Mumbai attack, which is the subject of the Pending Actions, and the claims asserted in this action are the same as certain of the claims asserted in the Pending Actions;

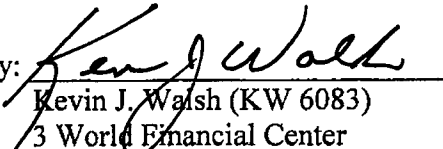
WHEREAS, counsel are in agreement that a single, unified procedure for all three cases will be the most efficient way to proceed and will benefit both the parties and the Court;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel:

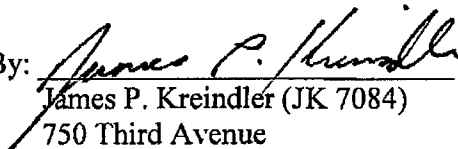
1. The provisions of the Court's Order dated April 12, 2011 with respect to procedure for motions to dismiss by these Defendants will apply and govern motions in this action.
2. Defendants' initial Motion to Dismiss in the Pending Actions will be deemed to have been filed in this action. On behalf of Plaintiff Ragsdale, counsel for Plaintiff hereby adopts all arguments made and all factual submissions filed in Defendants' initial Motion to Dismiss in the Pending Actions and no further submissions will be filed on the pending motion.
3. Any decision and order entered on Defendants' initial Motion to Dismiss in the Pending Actions will be entered and effective as an Order in this Action as well.

Dated: New York, New York  
August 18, 2011

**LOCKE LORD BISSELL & LIDDELL LLP**

By:   
Kevin J. Walsh (KW 6083)  
3 World Financial Center  
New York, NY 10281-2101  
Tel No.: (212) 415-8600  
Fax No.: (212) 303-2754  
*Counsel for Defendants*  
*Inter-Services Intelligence Of The Islamic*

**KREINDLER & KREINDLER**

By:   
James P. Kreindler (JK 7084)  
750 Third Avenue  
New York, New York 10017-5590  
Tel No.: (212) 687-8181  
Fax No.: (212) 972-9432  
*Counsel for Plaintiff, Linda Ragsdale*

*Republic Of Pakistan, Ahmed Shuja Pasha  
and Nadeem Taj*

**SO ORDERED:**

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U.S.D.J.